

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
ADRIA ENGLISH,

*Plaintiff,*

Case No.: 1:24-cv-05090

-against-

Hon. Judge Torres

SEAN COMBS also known as P.DIDDY,  
DIDDY, PUFF, PUFF DADDY, PUFFY,  
BROTHER LOVE” (an Individual), BAD  
BOY ENTERTAINMENT HOLDINGS,  
INC. (a corporation), SEAN JOHN  
CLOTHING L.L.C., INC. (a corporation),  
COMBS GLOBAL ENTERPRISES (a  
corporation), JOHN AND JANE DOES 1-10,  
and ORGANIZATIONAL DOES 1-10,  
Inclusive

*Defendants*

DECLARATION OF JOEL TAYLOR, ESQ.

I, Joel M. Taylor, do hereby declare pursuant to 28 U.S.C. 1746:

1. I am a partner of Kagen Caspersen & Bogart PLLC (“KCB”), counsel for Plaintiff Adira English.

2. KCB was engaged by Ms. English on December 6, 2024, pursuant to the terms of an engagement letter between KCB, Ms. English and the Andrews & Thorton firm (the “KCB Engagement Letter”).

3. KCB is local counsel for Ms. English. Andrews & Thorton is primary counsel to Ms. English.

4. In the KCB Engagement Letter Ms. English agreed that Andrews & Thornton “will serve as primary counsel in this Matter,” that KCB will “act as a local counsel to assist with minor tasks,” and that “subject to appropriate ethical and professional standards” KCB will “take instruction from Andrews & Thornton with regard to the Matter.

5. KCB agreed to serve as Plaintiff's local counsel in reliance on Andrews & Thornton's substantial experience with claims of sexual abuse and of violation of the Trafficking Victims' Protection Act.

6. I understand that there has been a breakdown in communications and the attorney-client relationship between Ms. English and Andrews & Thorton, and indirectly KCB, making unreasonably difficult for KCB to continue as counsel for Ms. English.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 10, 2025

/s/ Joel Taylor

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Joel Taylor